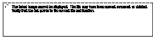


Message

From: Brandon C. Cooper [Brandon.Cooper@hrpassociates.com]
Sent: 4/29/2019 5:04:43 PM
To: Marsh, Karen [Marsh.Karen@epa.gov]
CC: Hambrick, Amy [Hambrick.Amy@epa.gov]
Subject: RE: Subpart OOOOa LDAR question
Attachments: ATT00001.txt

Thanks for the quick response Karen!



Brandon Cooper, EIT | Senior Project Engineer
HRP Associates, Inc.
M 585.831.0809

From: Marsh, Karen [mailto:Marsh.Karen@epa.gov]
Sent: Monday, April 29, 2019 11:44 AM
To: Brandon C. Cooper
Cc: Hambrick, Amy
Subject: RE: Subpart OOOOa LDAR question

Hi Brandon,

Amy forwarded your message to me. Hopefully the information is helpful. Let me know if you have any additional questions.

The language in NSPS OOOOa does not differentiate operation status of the wells for conducting fugitive emissions monitoring. Therefore, once you are subject to monitoring, you must complete monitoring within the specific timeframes listed in the rule. In your specific question, the well site would still need to be monitored within the existing semiannual schedule, even if that means monitoring while the well(s) is shut-in.

Thanks,
Karen

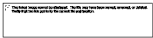
Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division
Fuels and Incineration Group
109 TW Alexander Drive, Mail Code E143-05
Research Triangle Park, NC 27711
Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Brandon C. Cooper <Brandon.Cooper@hrpassociates.com>
Sent: Monday, April 29, 2019 10:26 AM
To: Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: Subpart OOOOa LDAR question

Hi Amy,

I have a quick question regarding the LDAR requirement for wellpads in Subpart OOOOa. If a wellpad is shutin for an extended period of time (say 3 months or more) and this overlaps with the next scheduled LDAR inspection date, I

assume the next LDAR inspection should be conducted once the wells come back online and then the LDAR inspection after that one is to be conducted 6 months after that date. Is this a correct assumption? I only ask because this would likely result in less than 2 LDAR inspections conducted during the one year reporting period. Thanks!



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